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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

Case No.: 2:17-cv-01514-JCM-NJK

Plaintiff,

VS.

HSBC BANK USA, N.A., as trustee for
WELLS FARGO HOME EQUITY ASSET-
BACKED CERTIFICATES, Series 2006-3,
by its Attorney-in-fact WELLS FARGO
BANK, N.A.; WELLS FARGO BANK,
N.A.; and WELLS FARGO ASSET
SECURITIES CORPORATION,

Defendants.

**STIPULATION AND ORDER
TO EXTEND PLAINTIFF'S TIME
TO RESPOND TO DEFENDANTS'
MOTION TO REOPEN DISPOSITIVE
MOTION DEADLINE**

(FIFTH REQUEST)

NO FURTHER EXTENSIONS WILL BE GRANTED

Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank, N.A., and Wells Fargo Asset Securities Corporation (collectively, “Defendants” or “Wells Fargo”) and Plaintiff Edyta Gryglak (“Plaintiff” and together with Defendants, the “Parties”) hereby stipulate to extend by the current briefing schedule for Defendants’ Motion to Reopen Dispositive Motion Deadline [ECF 136] (the “Motion to Reopen”) to allow Plaintiff two additional weeks to prepare and file her response and to adjust the due date for Defendants’ reply to avoid defense counsel’s conflicts in other matters. If approved, this stipulation would extend the due date for Plaintiff’s opposition from April 28, 2021 to May 12, 2021, and the due date for Defendants’ reply from May 12, 2021 to May 26, 2021.

WHEREAS Defendants filed their Motion to Reopen on February 24, 2021;

1 WHEREAS the Court granted Plaintiff Edyta Gryglak's four prior requests, which
 2 collectively extended the due date to file opposing papers from March 10, 2021 to April 28, 2021,
 3 *see Orders [ECF 138, 140, 142, 144];*

4 WHEREAS Ms. Gryglak's lead counsel, Edward Griffith, needs an additional two weeks
 5 to prepare and file Plaintiff's opposition due to his litigation schedule on other matters and to
 6 continue his analysis of certain potentially relevant information;

7 WHEREAS due to Mr. Griffith's error, Ms. Gryglak inadvertently failed to file this
 8 Stipulation and Proposed Order by April 28, 2021, the current due date for her response, she seeks
 9 approval of this Stipulation and Order pursuant to Rule 6(b)(1)(B) of the Federal Rules of Civil
 10 Procedure; and

11 WHEREAS Wells Fargo consents to this request;

12 **THE PARTIES HEREBY STIPULATE:**

13 1. Ms. Gryglak's due date to file papers in opposition to Wells Fargo's Motion to
 14 Reopen is extended by two weeks, from April 28, 2021 to May 12, 2021 and the due date for Wells
 15 Fargo's reply papers is extended from May 12, 2021 to May 26, 2021.

16 Dated: April 30, 2021

17 Dated: April 30, 2021

18 SNELL & WILMER L.L.P.

19 THE GRIFFITH FIRM

20 /s/ *Blakeley E. Griffith*

21 /s/ *Edward Griffith*

22 By: _____

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26 *Attorneys for Defendants*

27 *Attorney for Plaintiff*

ORDER

IT IS HEREBY ORDERED that the due date for Plaintiff to file papers in opposition to Defendants' Motion to Reopen Dispositive Motion Deadline is extended by two weeks, from April 28, 2021 to May 12, 2021, and the due date for Defendants to file reply papers is extended from May 12, 2021 to May 26, 2021.

IT IS SO ORDERED. No further extensions will be granted.

DATED May 3, 2021.

Jens C. Mahan
U.S. DISTRICT COURT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 30, 2021, I electronically filed the foregoing **STIPULATION**
3 with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF
4 system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF
5 system.

6 DATED this 30th day of April 2021.
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8 */s/ Edward Griffith*

9 EDWARD GRIFFITH, ESQ

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